

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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This document relates to:

Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., No. 04 Civ. 1923
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL REQUESTS FOR PRODUCTION
OF DOCUMENTS DIRECTED TO DUBAI ISLAMIC BANK**

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
March 21, 2016

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL REQUESTS FOR PRODUCTION
OF DOCUMENTS DIRECTED TO DUBAI ISLAMIC BANK**

Plaintiffs in *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on Dubai Islamic Bank (hereinafter "Defendant" or "DIB"), the following Second Set of Supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in Plaintiffs' First Set of Requests for Production of Documents Directed to Dubai Islamic Bank are incorporated herein by reference.

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL REQUESTS FOR PRODUCTION
OF DOCUMENTS DIRECTED TO DUBAI ISLAMIC BANK**

1. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of and/or for the benefit of Khalid Amer Ballayth (a/k/a Khalid Ballaith; a/k/a Khalid Amer Saed Ballaith; a/k/a Khalid Amir Salim Ballath; a/k/a Khalid Amer Salem Ballith), including but not limited to DIB Account No. 01 520 4851366 01, any DIB account for any entity in which Ballayth held any beneficial interest, and/or any DIB account over which Ballayth had signatory authority or had any actual or potential beneficial interest. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among Ballayth and/or his representative(s) and DIB, documents detailing the establishment of and/or closing of the account(s), Know-Your-Customer and/or other customer due diligence reports, suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

2. Please provide all documents relating to all other transactions at DIB, financial or otherwise, involving Khalid Amer Ballayth or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 1 above.

ANSWER:

3. Please provide all documents exchanged between DIB and InfoFort (or their respective insurers) concerning the August 14, 2014 fire at InfoFort.

ANSWER:

4. Please provide all documents that describe any efforts that were undertaken by InfoFort, DIB, or any other party to salvage records located at the affected facility, in the aftermath of the August 14, 2014 fire.

ANSWER:

5. Please provide all investigative reports concerning the August 14, 2014 fire, including any investigative reports by local authorities or any private investigators.

ANSWER:

6. Please provide a description of any categories of documents that are responsive to any of plaintiffs' document requests that DIB believes may have been destroyed in the August 14, 2014 fire.

ANSWER:

Dated: March 21, 2016

Respectfully submitted,

/s/
THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Second Set of Supplemental Requests for Production of Documents Directed to Dubai Islamic Bank was served via electronic mail this 21st day of March 2016, upon:

Steven T. Cottreau, Esq.
Clifford Chance U.S., LLP
2001 K Street, N.W.
Washington, D.C. 20006-1001

Alan R. Kabat, Esq.
Bernabei & Wachtel, PLLC
1775 T Street, N.W.
Washington, D.C. 20009-7124

(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

/s/
J. Scott Tarbutton, Esq.

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Attachment A

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

January 11, 2016

Via E-mail (steve.couttreau@cliffordchance.com)

Steven T. Couttreau, Esquire
Clifford Chance US, LLP
2001 K Street, NW
Washington, DC 2006-1001

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Steve:

We write concerning your December 18, 2015 letter to Judge Maas, in which you alerted the Court (and us) of the August 14, 2014 fire at InfoFort, Dubai Islamic Bank's offsite records storage provider. Your letter to the Court indicates that you currently "believe that many (but not likely a majority) of paper transaction records at issue in the Motion to Compel were destroyed in the fire."

We would like to discuss the circumstances surrounding the fire with you in the near future, and in anticipation of that dialogue, would ask that you kindly provide the following information and documentation.

1. Any and all documents exchanged between Dubai Islamic Bank and InfoFort (or their respective insurers) concerning the fire.
2. Any and all documents that describe any efforts that were undertaken by InfoFort, Dubai Islamic Bank, or any other party to salvage records located at the affected facility, in the aftermath of the fire.
3. Any and all investigative reports concerning the fire, including any investigative reports by local authorities or any private investigators.
4. A description of any categories of documents that are responsive to any of plaintiffs' document requests that DIB believes may have been destroyed in the fire.

January 11, 2016
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We will follow up with formal discovery requests, but thought it best to present these requests to you as soon as possible.

Very truly yours,

A handwritten signature in black ink, appearing to read 'S. P. Carter', with a large, sweeping flourish extending to the right.

Sean P. Carter

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

cc: Jodi Flowers, Esquire
Robert Haefe, Esquire
James Kreindler, Esquire
Andrew Maloney, Esquire
Jerry Goldman, Esquire
J. Scott Tarbutton, Esquire

Attachment B

BALLAITH Khalid Amer Saed

Considerable incriminating information regarding this individual have come to the attention of the Federal Judicial Police.

Whilst carrying out his duties as the director of European operations of Muwafaq in relation with Yassin Abdullah KADI, Chafiq Ayadi made an order in September 1994 to the Binjad Establishment, situated in Dubai (Po Box 13621) for a series of vehicles destined for Muwafaq in Bosnia Herzegovina. The Binjad Establishment was then under the direction of Khalid Amer BALLAITH. According to information obtained by our department, the latter would be a close associate of Osama Bin Laden.

Khalid Amer BALLAITH is also the director of the Sana Trading Establishment, which is the holding company of the Binjad Establishment, situated at the same address (Po Box 13621, Dubai). Khalid Amer BALLAITH is associated with Ghalib Omar and Naeef Omar¹⁵⁰.

At the time the orders were made by the Binjad Establishment for vehicles for the Muwafaq foundation, Chafiq Ayadi became domiciled at the IGASA foundation (alias IIRO) at Zagreb, Gotovca 1/1, which confirms the interoperability between the two organizations: the Muwafaq organization and the IIRO organization¹⁵¹. Moreover, when the order was made on the 28th July 1994 by Chafiq Ayadi, there is mention of the fact that the vehicles were to be shared between Muwafaq and the IGASA¹⁵². It is thus established that the Muwafaq foundation acted closely with the IIRO foundation, another organization which is regularly referred to as a supporter of the activities of Osama Bin Laden.

In order to establish the interoperability between the Muwafaq and IIRO organizations, one simply needs to consider the cheque issued by Saleem Ahmed BIN MAHFOUZA, a Saudi doctor, also an administrator of the Muwafaq foundation in Germany and in Belgium, paying the sum of 500'000 dollars US to Chafiq Ayadi (SDGT), director of the Muwafaq for the Balkans on the 22nd April 1996 via the SKB Bank¹⁵³. Saleem Ahmed BIN MAHFOUZ was also at that time the administrator of the Muwafaq foundation together with Yassin Abdullah KADI.

A detailed Interpol report considers the role of the BIN MAHFOUZ, and in particular that of Saleem A. O. BIN MAHFOUZ in the management of charitable organizations in Bosnia Herzegovina. According to the information provided by Ljubljana, Slovenia Interpol, Saleem A. O. Bin Mahfouz, 04/09/1949, originating from Jeddah in Saudi Arabia, is involved in the fraudulent management of one of the charitable Islamic organizations, the International Islamic Relief Organization. The Interpol information regarding this individual specify that he received a cheque for two million US dollars from the National Commercial Bank issued in his name, and that he cashed said cheque in his name at the SKB Bank DD at Ljubljana, in Slovenia.

¹⁵⁰ Kompass file, Middle East

¹⁵¹ Attachments to answer to Swiss Questionnaire concerning Yassin Abdullah KADI, dated 14th March 2004

¹⁵² Attachments to answer to Swiss Questionnaire concerning Yassin Abdullah KADI, dated 14th March 2004

¹⁵³ Interpol notice Ljubljana, 2251592 IP 5853015 dated 18/03/2002

بنك دبي الإسلامي
DUBAI ISLAMIC BANK
MAIN OFFICE المركز الرئيسي
DEIRA - DUBAI ديرة - دبي

DATE 17-8-95 التاريخ

No: 1400140
A B 80 / 54

Pay Against this Cheque
order of MOHAMMED A. BIN MAHAFOUZ لاير
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thousand two hundred forty nine
and Fifty Two only
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